

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Beatriz Espinoza,

Plaintiff

v.

Costco Wholesale Corporation d/b/a Costco
Wholesale #685,

Defendant

Case No. 2:24-cv-01425-CDS-EJY

Order Rejecting Proposed
Joint Pretrial Order

[ECF No. 23]

This is a premises liability case arising from a slip-and-fall incident. Plaintiff Beatriz Espinoza and defendant Costco Wholesale Corporation d/b/a Costco Wholesale #685 filed a proposed joint pretrial order. ECF No. 23. For the following reasons, the joint pretrial order does not comply with Local Rules 16-3 and 16-4, thus I reject it.

First, the parties include a blanket list of the following objections to each other's exhibits: "relevance, hearsay, lack of foundation, authenticity, prejudicial versus probative value, and admissibility." ECF No. 23 at 6, 11. But they do not link any those objections to any specific exhibit. Objections must relate to each exhibit, and not merely be generic objections to all exhibits.

Second, LR 16-3(b)(10) requires parties to identify the depositions they intend to offer at trial, "designating the portions of the depositions to be offered." The plaintiff ignores this rule by listing her deposition without designating the specific portions to be offered at trial. *Id.* at 12. Although the parties have incorrectly "reserved" objections at this time, the lack of designation makes it impossible for the defendant to state its objections as required by LR 16-3(b)(11).

Third, both witness lists include numerous "person most knowledgeable" or "custodians of records," which might be unnecessary if the parties discuss stipulating to authenticity as required by Local Rule 16-3(b)(8)(B). *Id.* at 12-18. Moreover, it would be impossible to present 45 witnesses in a seven or eight-day trial. The purpose behind the joint pretrial order is to

1 streamline trial preparation and the presentation of evidence. The parties must meet and confer
2 regarding witnesses will actually be needed a trial, and then include a realistic witness list in the
3 amended JPTO.

4 Finally, the proposed order is rejected because it does not include § XI to provide the
5 “action by the court” as required under LR 16-4.

6 **Conclusion**

7 IT IS HEREBY ORDERED that the parties’ proposed joint pretrial order [ECF No. 23] is
8 **REJECTED**. The parties must confer and submit a second proposed joint pretrial order by
9 August 22, 2025.

10 Dated: August 8, 2025

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12 Cristina D. Silva
13 United States District Judge
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